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WRITER'S DIRECT DIAL

December 14, 2011

**Via Electronic Comment Filing System**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: *Ex Parte* Notification Regarding MB Docket No. 00-168

Dear Ms. Dortch:

On December 13, 2011, on behalf of Hearst Television Inc. ("Hearst"), I met with Commissioner Robert McDowell and his Acting Legal Advisor for Mass Media Erin McGrath.

At this meeting, I expressed Hearst's concerns about the Commission's proposals in MB Docket 00-168 to require broadcast licensees to make available to the Commission for posting on the FCC's website political file and sponsorship identification records. While Hearst is generally supportive of placing online certain items currently required to be maintained in the local public inspection file, it believes the political file and sponsorship identification proposals are ill

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advised and will add significant operational burdens on broadcasters. Hearst believes the costs and burdens to stations and to the government associated with posting the political file and sponsorship identification information online would far exceed the costs and burdens associated with maintenance of the local public file under the Commission's existing rules. The current processes to prepare political file materials for the public file are manually intensive—to meet the proposed FCC requirements for political and sponsorship identification records, Hearst would like to automate these processes, and there are technical challenges to achieve this goal.

In response to the anticipated FCC action several years ago to move to an online public file, Hearst proactively created an electronic public file. I discussed Hearst's work over the past several years on developing this online public file hosted by Hearst. I explained Hearst's experience with the operational and data processing challenges created by attempts to place all required political file data online.

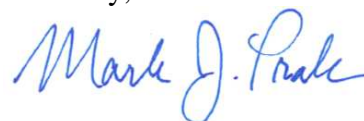
I also discussed the actual operation of the political file rule pursuant to current Commission rules and policies.

Additionally, I explained that the Commission's proposals with respect to the political file and sponsorship identification would result in average costs to stations, as calculated by Hearst, ranging from \$30,000 to \$120,000-\$140,000 per station per year. Hearst has estimated that, should the proposals be adopted without modification, it would be required to hire at least one new full-time equivalent employee and perhaps as many as four new employees per station—in the worst case scenario, one employee to handle political file compliance and three others to ensure compliance with the sponsorship identification proposal. I noted that the actual cost of compliance may be less if certain efficiencies could be realized through administering the required tasks on a group basis with respect to the political file and sponsorship identification requirements, and reduced further by securing the cooperation of the networks and syndicated program suppliers with respect to the sponsorship identification requirements.

Finally, I suggested, as an alternative to the Commission's proposals concerning the political file, that the Commission consider allowing stations to periodically (*e.g.*, annually, quarterly, etc.) provide certain aggregated information on candidate spending to be placed online, in lieu of individualized records. This alternative would reduce the burden on stations while still making public political expenditures.

Please contact the undersigned if you have any questions concerning this matter.

Sincerely,



Mark J. Prak  
*Counsel to Hearst Television Inc.*

cc: Commissioner Robert McDowell  
Erin McGrath  
(courtesy copies)